

CAUSE NO. 2019-23790

MERIDIAN HOSPITAL SYSTEMS CORPORATION,	§	IN THE DISTRICT COURT
	§	
	§	
PLAINTIFF,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
POST ACUTE MEDICAL, LLC, PAM PHYSICIAN ENTERPRISE, CLEAR LAKE INSTITUTE FOR REHABILITATION, LLC, KEY MANAGEMENT GROUP, LLC,	§	
	§	
	§	
DEFENDANTS.	§	11th JUDICIAL DISTRICT

DECLARATION OF SAJEEV THOMAS


1. My name is Sajeev Thomas. I am over 18 years of age and am of sound mind. I have never been convicted of a crime or a misdemeanor involving moral turpitude. I am under no legal disability and I am fully competent to make this Declaration. I have personal knowledge of the facts and statements recited herein. I swear that each of the statements I have made in this Declaration is true and correct.

2. I have reviewed Exhibits D and E to Plaintiff's Amended Petition and Application for Temporary Restraining Order and Temporary Injunction. It is my understanding that Meridian Hospital Systems, Corporation ("Meridian") filed both of these documents with the Harris County District Clerk, and they are publicly available.

3. The data contained within these screen shots is "dummy data." "Dummy data" is often used when developing software. "Dummy data" is benign information that does not contain any useful data, but is used to reserve space where real data would normally exist. No patient data is divulged in either Exhibit D or E and "Calverly Leonam" was not and is not a

patient of Post Acute Medical, LLC. The listed admit and discharge dates for this patient on Exhibit D are fictitious dummy data.

4. Further Declarant sayeth naught.



Sajeew Thomas

My name is Sajeew Thomas, my date of birth is 08/15/1971, and my address is 1213 CHELSEN CROSS Pennsylvania, 17050, United States of America. I declare under penalty of perjury that the foregoing is true and correct.
~~MECHANICS BURG~~

Executed in Williamson County, on the 26th day of June, 2019.



Sajeew Thomas